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Attorney for Plaintiff,
LIBERTY MEDIA HOLDINGS, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Liberty Media Holdings, LLC)	Case No. 11-CV-0280-PHX-LOA
)	
Plaintiff,)	Declaration of Eric Gapp in Support of
)	Supplement
vs.)	
)	
Vinigay.com; Gustavo Paladeski; Vinicius)	
Alves)	
)	
Defendants.)	
)	

I, Eric Gapp, declare under penalty of perjury that:

1. I am the Vice President of Intellectual Property Management for Plaintiff Liberty Media Holdings (Liberty).
2. As part of my duties, I regularly patrol the Internet for instances of piracy, and actively participate in litigation against online pirates.
3. As such, the following is based upon personal knowledge.
4. On February 7, 2010, I became aware of the website, Vinigay.com, and conducted a review of the site. During this review, I discovered the Works being displayed and distributed by Vinigay.com. In fact, the sole type of videos appearing on the Vinigay.com website appeared to be the copyrighted works of Plaintiff and other studios.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on July 31, 2011. Service was made on Defendants by email pursuant to the Court's Order (ECF No. 10).

Dated: July 31, 2011

Respectfully submitted,

s/ Marc Randazza

Marc J. Randazza, SBN 269535

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